



GVNW CONSULTING, INC.

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TUALATIN, OR 97062
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www.gvnw.com

Received & Inspected

JUN 18 2015

FCC Mail Room

June 16, 2015

REDACTED – FOR PUBLIC INSPECTION

VIA Courier

Marlene H. Dortch, Secretary
Federal Communication Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

DOCKET FILE COPY ORIGINAL

Re: Confidential Financial Information Subject to Protective Order in WC Docket Nos. 14-58, 07-135, 05-337, 03-109, CC Docket Nos. 01-92, 96-45, GN Docket No. 09-51, WT Docket No. 10-208. Before the Federal Communications Commission.
Form 481 – Carrier Annual Reporting Data Collection, 2015

Dear Ms. Dortch:

On behalf of Arctic Slope Telephone Association Cooperative, Inc. ("ASTAC") (dba ASTAC Wireless LLC-SAC 619010), GVNW Consulting, Inc. hereby submits the attached redacted and confidential versions of its "FCC Form 481 – Carrier Annual Reporting Data Collection" information pursuant to sections 54.313 and 54.422 of the Commission's rules, as filed with the Universal Service Administrative Company. A copy is also being submitted to the Public Utility Commission of Alaska.

ASTAC requests confidential treatment pursuant to sections 0.457 and 0.459 of the Commission's rules for those items in the annual Board Meeting Minutes not related to the Tribal Engagement Obligation required by section 54.313(a)(9). As a matter of policy, the information contained in the Board Meeting Minutes is only available to the membership of the Cooperative, not the general public.

In accordance with the Protective Order, two redacted copies marked "REDACTED – FOR PUBLIC INSPECTION" and one non redacted confidential version marked "CONFIDENTIAL – NOT FOR PUBLIC INSPECTION" are being filed with the Commission. A redacted copy has also been filed via the Electronic Comment Filing System.

If you have any questions, please contact me at 503-612-4418.

Sincerely,

Ken Snow
GVNW Consulting, Inc.

No. of Copies rec'd 0+1
List ABCDE

Enclosures

cc: Mr. Charles Tyler, FCC Telecommunications Access Policy Division (two copies, confidential)
J. Smith, GVNW

Form 474 - Annual Reporting

<010> Study Area Code	619616	Received & Inspected
<015> Study Area Name	ASTAC Wireless TAC - CT	
<020> Program Year	2016	
<030> Contact Name: Person USAC should contact with questions about this data	Clover Kohn11	JUN 18 2015
<035> Contact Telephone Number: Number of the person identified in data line <030>	9078642680 ext.	FCC Mail Room
<039> Contact Email Address: Email of the person identified in data line <030>	clover@astac.net	

ANNUAL REPORTING FOR ALL CARRIERS

		Y16C Completion Required	Y16C Completion Required
<100> Service Quality Improvement Reporting	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<200> Outage Reporting (voice)	(complete attached worksheet)	<input type="checkbox"/>	<input type="checkbox"/>
<210> <input checked="" type="checkbox"/> -- check box if no outages to report		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<300> Unfulfilled Service Requests (voice)	0	<input type="checkbox"/>	<input type="checkbox"/>
<310> Detail on Attempts (voice)	(attach descriptive document)	<input type="checkbox"/>	<input type="checkbox"/>
<320> Unfulfilled Service Requests (broadband)		<input type="checkbox"/>	<input type="checkbox"/>
<330> Detail on Attempts (broadband)	(attach descriptive document)	<input type="checkbox"/>	<input type="checkbox"/>
<400> Number of Complaints per 1,000 customers (voice)		<input checked="" type="checkbox"/>	<input type="checkbox"/>
<410> Fixed	0.0	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<420> Mobile	0.0	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<430> Number of Complaints per 1,000 customers (broadband)		<input type="checkbox"/>	<input type="checkbox"/>
<440> Fixed		<input type="checkbox"/>	<input type="checkbox"/>
<450> Mobile		<input type="checkbox"/>	<input type="checkbox"/>
<500> Service Quality Standards & Consumer Protection Rules Compliance	(check to indicate certification)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<510> 619010ak610.pdf	(attach descriptive document)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<600> Functionality in Emergency Situations	(check to indicate certification)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<610> 619010ak610.pdf	(attach descriptive document)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<700> Company Price Offerings (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<710> Company Price Offerings (broadband)	(complete attached worksheet)	<input type="checkbox"/>	<input type="checkbox"/>
<800> Operating Companies and Affiliates	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<900> Tribal Land Offerings (Y/N)?	(if yes, complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<1000> Voice Services Rate Comparability Certification	Yes	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<1010>	(attach descriptive document)	<input type="checkbox"/>	<input type="checkbox"/>
<1100> Certify whether terrestrial backhaul options exist (Yes or No)	(if no, check to indicate certification)	<input type="checkbox"/>	<input type="checkbox"/>
<1110>	(complete attached worksheet)	<input type="checkbox"/>	<input type="checkbox"/>
<1200> Terms and Condition for Lifeline Customers	(complete attached worksheet)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet			
<2000> Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers	(check to indicate certification)	<input type="checkbox"/>	<input type="checkbox"/>
<2005>	(complete attached worksheet)	<input type="checkbox"/>	<input type="checkbox"/>
Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet.			
<3000>	(check to indicate certification)	<input type="checkbox"/>	<input type="checkbox"/>
<3005>	(complete attached worksheet)	<input type="checkbox"/>	<input type="checkbox"/>

1100) Service Quality Improvement Reporting
 Data Collection Form
 FCC Form 1100
 OMB Control No. 3045-0047, OMB Control No. 3045-0048
 May 2015

<010> Study Area Code
 <015> Study Area Name
 <020> Program Year
 <030> Contact Name - Person USAC should contact regarding this data
 <035> Contact Telephone Number - Number of person identified in data line <030>
 <038> Contact Email Address - Email Address of person identified in data line <030>
 <110> Has your company received its ETC certification from the FCC?
 If your answer to Line <110> is yes, do you have an existing §54.202(a) "S
 <111> year plan" filed with the FCC?
 (yes / no) ☐ ☒
 (yes / no) ☐ ☐

If your answer to Line <111> is yes, then you are required to file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "S year plan" on file with the FCC, as it relates to your provision of voice telephony service.

<112> Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.513(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service.

Name of Attached Document

Please select the appropriate responses below (Yes, No, Not Applicable) to confirm that the attached document(s), on line 112, contains a progress report on its five-year service quality improvement plan pursuant to §54.202(a). The information shall be submitted at the wire center level or census block as appropriate.

<113> Maps detailing progress towards meeting plan targets	
<114> Report how much universal service (USF) support was received	
<115> How much (USF) was used to improve service quality and how support was used to improve service quality	
<116> How much (USF) was used to improve service coverage and how support was used to improve service coverage	
<117> How much (USF) was used to improve service capacity and how support was used to improve service capacity	
<118> Provide an explanation of network improvement targets not met in the prior calendar year.	

(201) 577-0600 • www.casatexas.org
 10000 North Loop West, Suite 1000 • Houston, TX 77037
 Texas Collection Point

<010>	Study Area Code	EL0010
<015>	Study Area Name	SEZEC Wireless LLC - CO
<020>	Program Year	2016
<050>	Contact Name - Person USAC should contact regarding this data	Elvonne Williams
<085>	Contact Telephone Number - Number of person identified in data file <080>	9075641610 ext.
<095>	Contact Email Address - Email Address of person identified in data file <080>	elvonne@sezec.com

[illegible]

<010>	Study Area Code	619630
<015>	Study Area Name	AS20AC Wireless LLC - CA
<020>	Program Year	2016
<050>	Contact Name - Person USAC should contact regarding this data	Clayton Mottola
<055>	Contact Telephone Number - Number of person identified in data file <030>	9078643480 ext.
<060>	Contact Email Address - Email Address of person identified in data file <030>	claytonmottola@usac.mil

3/2/2015	39.99
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[illegible]

<01>	Study Area Code	619010
<01>	Study Area Name	Aerobic WIndows SAC - CL
<02>	Program Year	2015
<03>	Contact Name - Person USAAC should contact regarding this data	CLOVERS MARI L
<03>	Contact Telephone Number - Number of person identified in data file <03>	9078612680 ext.
<03>	Contact Email Address - Email Address of person identified in data file <03>	clovers@ac.net

[illegible]

Study Area Code	Study Area Name	Program Year	Contact Name - Person USAC should contact regarding this data	Contact Telephone Number - Number of person identified in data line <030>	Contact Email Address - Email Address of person identified in data line <030>	Reporting Carrier	Holding Company	Operating Company	Doing Business As Company or Brand Designation
<010>	6197010								
<015>	ASTAC Systems Inc - CR	2015	Clarence McNeil	9075542680 ext.	clarence@astac.net	Arctic Slope Telephone Association Cooperative, Inc.	Arctic Slope Telephone Association Cooperative, Inc.	Arctic Slope Telephone Association Cooperative, Inc.	
<020>									
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<305>									
<310>									
<315>				</					

<010>	Study Area Code	CL0010
<015>	Study Area Name	AS20AC Windows TELC - CD
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Claver M@cll
<035>	Contact Telephone Number - Number of person identified in data line <030>	9075642410 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	cl.claver@usac.mil

North Slope Borough

63901a0520.pdf

Name of Attached Document

[illegible]

If your company serves Tribal lands, please select (Yes/No, NA) for each these boxes to confirm the status described on the attached document(s), on line 920, demonstrates coordination with the Tribal government pursuant to § 54.37.3(a)(9) includes:

- | | |
|-------|--|
| •921> | Needs assessment and deployment planning with a focus on Tribal community anchor institutions. |
| •922> | Feasibility and sustainability planning; |
| •923> | Marketing services in a culturally sensitive manner; |
| •924> | Compliance with Rights of way processes |
| •925> | Compliance with Land Use permitting requirements |
| •926> | Compliance with Facilities Siting rules |
| •927> | Compliance with Environmental Review processes |
| •928> | Compliance with Cultural Preservation review processes |
| •929> | Compliance with Tribal Business and Licensing requirements. |

§ 54.313(b) The terrestrial backhaul service is the service that provides the backhaul service to the service area. The backhaul service is the service that provides the backhaul service to the service area. The backhaul service is the service that provides the backhaul service to the service area.

<010>	Study Area Code	615010
<015>	Study Area Name	ASAC Wireless ILO - CL
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Clover M. Hall
<035>	Contact Telephone Number - Number of person identified in data line <030>	907646480 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	cllover@usac.mil

<1120> Please confirm whether terrestrial backhaul options exist within the supported area pursuant to § 54.313(g) (Yes, No).

<1130> Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(g).

<010>	Study Area Code	6394010
<015>	Study Area Name	2009AC Telco'sess TEL - CS
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Customer Name:13
<035>	Contact Telephone Number - Number of person identified in data line <030>	90799431680 ext.
<038>	Contact Email Address - Email Address of person identified in data line <030>	cjcorrea@usac.mcc
<1210>	Terms & Conditions of Voice Telephony Lifeline Plans	6139104041210.pdf
<1220>	Link to Public Website	<div> <div> Name of Attached Document: </div> <div> http://www.usac.mcc </div> </div>

Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.421(a)(2) annual reporting for EITCs receiving low-income support, carriers must annually report:

- | | |
|-------------------------------------|---|
| <input checked="" type="checkbox"/> | Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers. |
| <input checked="" type="checkbox"/> | Details on the number of minutes provided as part of the plan. |
| <input checked="" type="checkbox"/> | Additional charges for toll calls, and rates for each such plan. |

<01>	Study Area Code	652000
<02>	Study Area Name	ANZAC 44000000 1022 - 12
<03>	Program Year	2016
<04>	Contact Name - Person USMC should contact regarding this data	12090000 000011
<05>	Contact Telephone Number - Number of person identified in data file <03>	3078949490 0000
<06>	Contact Email Address - Email Address of person identified in data file <03>	12090000000000000000

Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of Incremental Connect America Phase 1 support, from High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.319(b)(4)(v)(4)(i). The information reported on this form and in the documents attached below is accurate.

--	--

Name of Attached Document(s) Using Required Information

[illegible]

Please check the box to confirm that the attached document(s), on line 2021, contains the required information pursuant to § 54.313 (e)(3)(ii), as a recipient of CAP Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.

--

Range of Available Documents Listing Required Information

4810	Study Area Code	654910
4815	Study Area Name	2025C 31333333 3333 - CR
4820	Program Year	2016
4825	Contact Name - Person (USAC should contact regarding this data)	CLAYTON, NIGEL-1
4830	Contact Telephone Number - Number of person identified in line 4825	5075543 830 400
4835	Contact Email Address - Email Address of person identified in line 4825	CLAYTON.NIGEL@USAC.MIL

USAC (the lower below) to make changes as to how your study plan (submitted to 47 CR § 54.333333) and, for publicly held entities, meeting compliance with the financial reporting requirements set forth in 47 CR § 54.333333. I further certify that the information reported on this form is in the documents attached below is accurate.

Programs Subject to 3 Year Plus
 Milestone Certification (47 CR § 54.333333)

2016

Please check this box to confirm that the attached document(s), on line 2012, contains the required information pursuant to § 54.333333, the center that provides the number, name, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.

2012

Community Anchor Institutions (47 CR § 54.333333)

Is your company's Website Held FOR Center (47 CR § 54.333333)?

2013

If yes, does your company file the RDS annual report?

2014

Please check these boxes to confirm that the attached document(s), on line 2017, contains the required information pursuant to § 54.333333 compliance requires:

2015

Electronic copy of fiscal annual RDS reports (Reporting Report for Telecommunications Services)

2016

Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

2017

If the response is yes on line 2014, which your company's RDS annual report and all required documentation

2018

If the response is no on line 2014, is your company audited?

2019

If the response is yes on line 2018, please check the boxes below to confirm your submission, on line 2020 pursuant to § 54.333333, contains:

2020

Issue a copy of their audited financial statement or (2) a financial report in format comparable to RDS Operating Report for Telecommunications

2021

Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

2022

Management letter and audit opinion issued by the independent certified public accountant that performed the company's financial audit

2023

If the response is no on line 2018, please check the boxes below to confirm your submission, on line 2025 pursuant to § 54.333333, contains:

2024

Copy of risk financial statement which has been subject to review by an independent certified public accountant or (2) a financial report in format comparable to RDS Operating Report for Telecommunications

2025

Underlying information subject to a review by an independent certified public accountant

2026

Underlying information subject to an officer certification.

2027

Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

2028

Attach the worksheet listing required information



<010>	Study Area Code	01000
<020>	Study Area Name	02000
<030>	Program Year	03000
<040>	Contract Name - Project USAC should contain specific data	04000
<050>	Contract Telephone Number - Number of person identified in data file	05000
<060>	Contract Email Address - Email Address of person identified in data file	06000

Financial Data Summary

- (3027) Revenue
- (3028) Operating Expenses
- (3029) Net Income
- (3030) Telephone Plant In Service (TPIS)
- (3031) Total Assets
- (3032) Total Debt
- (3033) Total Equity
- (3034) Dividends



<010> Study Area Code	619010
<015> Study Area Name	ASTAC Wireless LLC - CL
<020> Program Year	2016
<080> Contact Name - Person USAC should contact regarding this data	Clover McNeil
<090> Contact Telephone Number - Number of person identified in data line <080>	9075643580 ext.
<099> Contact Email Address - Email Address of person identified in data line <080>	clover@astac.net

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier:	ASTAC Wireless LLC - CL
Signature of Authorized Officer:	CERTIFIED ONLINE Date 06/11/2016
Printed name of Authorized Officer:	Clover McNeil
Title or position of Authorized Officer:	CEO
Telephone number of Authorized Officer:	9075643580 ext.
Study Area Code of Reporting Carrier:	619010 Filing Due Date for this form: 07/01/2016
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Certification Agent - Carrier	
<010> Study Area Code	519010
<015> Study Area Name	ABTAC Wireless ZSO - Cl.
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Clover McNeil
<035> Contact Telephone Number - Number of person identified in data line <030>	9078642680 ext.
<035> Contact Email Address - Email Address of person identified in data line <030>	clover@abtac.net

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) _____ is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent: _____	
Name of Reporting Carrier: _____	
Signature of Authorized Officer: _____	Date: _____
Printed name of Authorized Officer: _____	
Title or position of Authorized Officer: _____	
Telephone number of Authorized Officer: _____	
Study Area Code of Reporting Carrier: _____	Filing Due Date for this form: _____
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 502(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier: _____	
Name of Authorized Agent or Employee of Agent: _____	
Signature of Authorized Agent or Employee of Agent: _____	Date: _____
Printed name of Authorized Agent or Employee of Agent: _____	
Title or position of Authorized Agent or Employee of Agent: _____	
Telephone number of Authorized Agent or Employee of Agent: _____	
Study Area Code of Reporting Carrier: _____	Filing Due Date for this form: _____
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 502(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Attachments

[illegible]

54.313(a)(5) Satisfaction of Consumer Protection and Service Quality Standards

Consumer Protection

Voice

Arctic Slope Telephone Association Cooperative, Inc. complies with the requirements of 47 CFR Part 64 Subpart U, Customer Proprietary Network Information and the Federal Trade Commission Red Flag rules to prevent identity theft. A manual for each of those programs is in place and is part of the employees' handbook. Employee training is conducted annually and new hires are instructed on the programs as required by their job functions. This applies to all lines of business (voice, broadband, wireless and lifeline).

Service Quality Standards

Voice

Arctic Slope Telephone Association Cooperative, Inc. complies with the service standards of the State of Alaska promulgated in Alaska Statutes, Title 3 Commerce, Community, and Economic Development Part 7 Regulatory Commission of Alaska, 3 AAC 52.200-3, AAC 52.340, Telephone Utilities and Alaska Administrative Code 3 AAC 53.700 State Telecommunications Modernization. This applies to all lines of business (voice, broadband, wireless and lifeline).

Functionality in Emergency Situations

In 7 of our village locations (Point Hope, Point Lay, Wainwright, Atkasuk, Nulqsut, Kaktovik and Anaktuvuk Pass) we have fully redundant Redcom local exchange switches. The central offices that these switches are installed in are equipped with back up batteries designed to support an 8 hour power disruption. In addition, each location has a standby generator that will come on line automatically in the event of the loss of commercial power. These generators are equipped with external fuel tanks that will provide for 4 or 5 days of unattended operation. We have village reps in these villages that can check the site during an emergency and have fuel delivered if necessary.

In our two largest exchanges, Barrow and Deadhorse we have fully redundant DMS 10 local exchange switches. The central offices these switches are installed in are equipped with back up batteries to support an 8 hour power disruption. In addition, each location has a standby generator that will come on line automatically in the event of loss of commercial power. These generators are equipped with external fuel tanks that will provide for 4 or 5 days of unattended operation. In addition these locations are manned 7 days a week for emergency response.

In both Barrow and Deadhorse we have battery back at all remote locations and any locations without permanent standby generators are supported by portable generators.

In all locations we work with the two long distance carriers to reroute traffic as required to recover from network outages or traffic spikes. We have redundant routes to both major carriers.

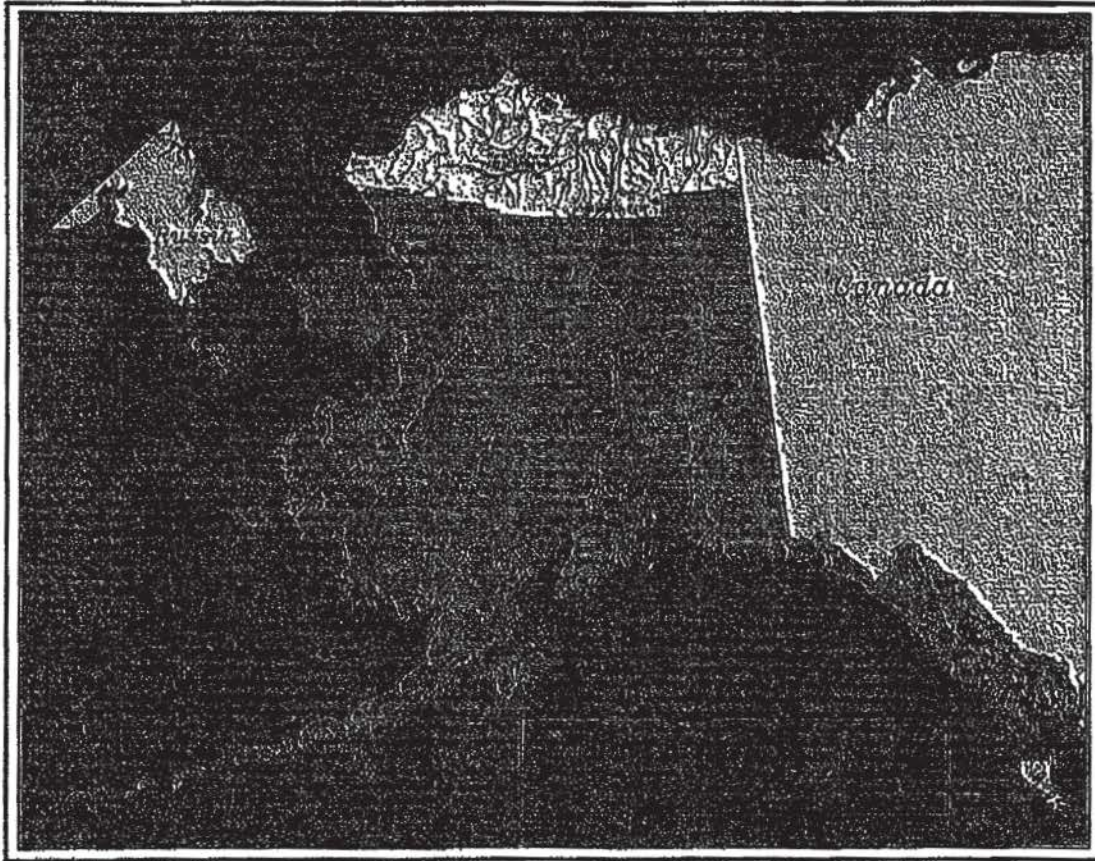
Arctic Slope Telephone Association Cooperative, Inc.

Certification of Tribal Engagement

For the Year Ending December 31, 2014



Service Area Description: Arctic Slope Telephone Association Cooperative, Inc. (ASTAC) serves the North Slope Region of Alaska. Our service area encompasses over 89,000 square miles and has seven traditional Native villages, the City of Barrow and the oilfields of Prudhoe Bay scattered across that expanse. With the exception of Prudhoe Bay, which is built out from the terminus of the Dalton Highway, all other villages can only be reached year round by aircraft.



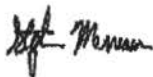
Tribal Entities: There are ten federally recognized Tribal Entities within ASTAC's serving area. Each of the seven villages and Barrow has a Native Village organization. Arctic Slope Native Association (ASNA) is the Tribal Entity that manages the Samuel Simmonds Memorial Hospital in Barrow and the Inupiat Communities of the Arctic Slope (ICAS) serves as an "umbrella" government for eight remote Inupiat villages known as the Inupiat "community" spread out along the Arctic Ocean and in the interior, just above the Arctic Circle.

The Process: Following the guidelines in DA 12-1165, ASTAC's Executive Leadership Team made multiple attempts to either coordinate telephonic meetings for Tribal Engagement or meet the requirement through proxy of the engagement process by the tribal entity to the village's elected Director to the ASTAC Board. Tribal leadership points of contact were updated to reflect current information (Table 1). A cover letter was created to explain the new process and asking for the Tribal Entity's cooperation in meeting our Tribal Engagement obligations. The cover letter borrowed heavily from DA 12-1165. The cover letter was attached to a Tribal Pre-meeting questionnaire which also extracted the questions from DA 12-1165 for Native leaders to consider prior to the telephonic engagement meeting. These two documents were sent on October 17, 2014. An example of the cover letter and a blank Tribal Pre-meeting Questionnaire can be found at (Table 2).

The cover letter and pre-meeting questionnaire did not elicit a response from any of the Tribal entities who have not asked to be represented by their Tribe's Director on the ASTAC Board. Following the mailing of the first letter, ASTAC had a regularly scheduled Board meeting on October 22d, where the Board approved numerous ongoing engagement items. Minutes for the Open portion of the meeting, including Board approval of engagement activities can be found at (Table 3). At this same Board meeting, Directors residing in the 5 communities who had been non-responsive to the engagement interaction were asked to do a personal follow up with the Tribal entity and all agreed to do so. The next step in the process was to do a second mailing of the engagement letter on December 10, 2013 with a cover letter reintroducing what we were trying to achieve (Table 4). Following this mailing, Charlie Carpenter, Chief of Network Operations requested a telephonic meeting. Telephonic logs for each Tribal Entity who did not proxy representation to their elected Director can be found at (Table 5).

Following multiple attempts to engage Tribal Leadership from October through December 2014, we were successful in connecting with 60% (six) of the ten Tribal entities. A recurring theme that was expressed in 2012 through 2014 was the appropriateness of using the ASTAC elected Board member as a representative of many of the Tribal entities, since the Board member is also a member of the Tribal entity, has received telecom specific training, and sets the direction for the Cooperative based on the will of the people who elect them. We received a written request to do so from the Native Villages of Barrow and Walnwright and verbal authorization from the Native Villages of Kaktovik, Nulqsut, Point Hope, and Anaktuvuk Pass (Table 6).

I certify that the above description of ASTAC's Tribal Engagement is a fair and accurate documentation of our efforts and that a copy of this certification has been provided via USPS to all of our Tribal entities.



December 31, 2014

Stephen L. Merriam, CEO

Date

Tab 1

2014 Tribal Leadership Roster

ICAS-Barrow
Doreen Lampe, CEO

ASNA
Marie Carroll, Director

Native Village Tribal Council-Presidents

Thomas Olemaun	Barrow
Edward Rexford Sr.	Kaktovik
Howard Patkotak	Wainwright
Margaret Pardue	Nulqist
Jack Schaffer	Pt. Hope
Margaret Ahngasak	Atkasuk
Pres. Village Council	Anaktuvuk Pass Individual stepped down, no one at this time
Leo Ferreira	Pt. Lay



Arctic Slope Telephone Association Cooperative, Inc.
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907-563-3989 • 1-800-478-6409 • 1-907-563-1932

October 17, 2014

Tab 2

Mr. Howard Patkotak, President
Village of Wainwright
P.O. Box 143
Wainwright, AK 99782

Dear Mr. Patkotak;

This letter is intended to help facilitate engagement between Tribal government officials and ASTAC, which provides service on Tribal lands with the use of Universal Service Fund (USF) support. In 2012, ASTAC met with all tribal entities on the North Slope. Based on feedback we received from Tribal leadership, we are amending our process to better collaborate with you.

A number of tribal entities pointed out that ASTAC has an elected Director to our Board representing your community. All Directors receive extensive industry training in telecommunications, meet four times yearly to set direction for the Cooperative and could potentially be a great resource in directing the Cooperative relative to your planning. It was highly suggested that the Director coordinate with you and speak for your tribal entity, engaging the Cooperative management team on your behalf. This would be much more responsive to your evolving needs due to the quarterly standing Board meetings where you could be represented. It would also save the membership a significant amount of money. For instance, in-person tribal engagement in 2012 cost the Cooperative almost \$28,000. Five of the ten tribal entities for the North Slope have adopted this approach in 2013, saving the membership significant money better used to upgrade the network for future offerings.

If this alternative approach makes sense to you, please email me at steve@astac.net and confirm your interest in using our Board member as your organization's representative for telecommunications issues, and we will take it from there. Thanks for your consideration of this tailored approach.

Best Regards,

Stephen Marriam, CEO

ASTAC, Serving the North Slope of Alaska since 1980